

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

09 Cr. 662 (PAC)

-against-

**NOTICE OF MOTION**

ROSS MANDELL, *et al.*,  
Defendants.

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**PLEASE TAKE NOTICE**, that the Defendant Ross Mandell and Hoffman & Pollok, LLP will move this Court before the Hon. Paul A. Crotty, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be fixed by the Court for an Order granting Mr. Mandell Bail Pending Appeal, and relieving Hoffman & Pollok, LLP as counsel in this matter and in this court, and appointing Matthew Brissenden, P.C., as substitute counsel under the Criminal Justice Act, and for such other and further relief as this court deems just and proper.

Dated: New York, New York  
May 22, 2012

Respectfully Submitted,

HOFFMAN & POLLOK LLP

By: *Susan C. Wolfe*  
Susan C. Wolfe

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*Of Counsel for purposes of this motion*